

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) Jointly Administered
)
)

**NOTICE OF DEBTORS' SECOND OMNIBUS MOTION FOR ENTRY OF ORDER (I)
AUTHORIZING REJECTION OF EXECUTORY CONTRACTS RELATED TO
EMPLOYMENT AGREEMENTS WITH MERCY HOSPITAL, IOWA CITY, IOWA, (II)
SETTING BAR DATE FOR REJECTION DAMAGES CLAIMS, AND (III) GRANTING
RELATED RELIEF**

PLEASE TAKE NOTICE that on February 29, 2024 Mercy Hospital, Iowa City, Iowa ("Mercy") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors") filed *Debtors' Second Omnibus Motion for Entry of Order (I) Authorizing Rejection of Executory Contracts Related to Employment Agreements with Mercy Hospital, Iowa City, Iowa, (II) Setting Bar Date for Rejection Damages Claims, and (III) Granting Related Relief* (the "Rejection Motion") [Docket No. 779].

PLEASE TAKE FURTHER NOTICE that the Rejection Motion seeks to reject certain of the Debtors' executory contracts of former employees.

PLEASE TAKE FURTHER NOTICE that objections to the Rejection Motion must be filed with the Clerk and served on the United States Trustee, Debtors, and Debtors' attorneys by no later than **Friday, March 22, 2024**.

PLEASE TAKE FURTHER NOTICE that the Debtors will proceed with a hearing to consider approval of the Rejection Motion on **Wednesday, March 27, 2024 at 10:30 A.M. (prevailing Central Time)** at the 6th Floor Courtroom, 111 Seventh Avenue SE, Cedar Rapids, Iowa 52401.

PLEASE TAKE FURTHER NOTICE any party that wishes to listen in only may use the following dial-in instructions:

**Dialing Number: 888-684-8852
Access Code: 7148063
Security Code: 0623**

Dated: Cedar Rapids, Iowa
February 29, 2024

NYEMASTER GOODE, P.C.

/s/ Roy Leaf

Roy Leaf, AT0014486
625 First Street SE, Suite 400
Cedar Rapids, IA 52401-2030
Telephone: (319) 286-7002
Facsimile: (319) 286-7050
Email: rleaf@nyemaster.com

- and -

Kristina M. Stanger, AT0000255
Matthew A. McGuire, AT0011932
Dana Hempy, AT0014934
700 Walnut, Suite 1600
Des Moines, IA 50309
Telephone: 515-283-3100
Fax: 515-283-8045
Email: mmcguire@nyemaster.com
kmstanger@nyemaster.com
dhempy@nyemaster.com

- and -

MCDERMOTT WILL & EMERY LLP

Felicia Gerber Perlman (admitted *pro hac vice*)
Daniel M. Simon (admitted *pro hac vice*)
Emily C. Keil (admitted *pro hac vice*)
444 West Lake Street, Suite 4000
Chicago, IL 60606
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: fperlman@mwe.com
dsimon@mwe.com
ekeil@mwe.com

- and -

Jack G. Haake (admitted *pro hac vice*)
2501 North Harwood Street, Suite 1900
Dallas, TX 75201
Telephone: (214) 295-8000
Facsimile: (972) 232-3098
Email: jhaake@mwe.com

Counsel for Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

The undersigned certifies, under penalty of perjury, that on this February 29, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of the Chapter 11 Cases.

/s/ Roy Leaf